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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

IN RE: FACEBOOK, INC. CONSUMER
PRIVACY USER PROFILE LITIGATION,

This document relates to:

ALL ACTIONS

CASE NO. 3:18-MD-02843-VC

**DECLARATION OF HEATHER L.
RICHARDSON IN SUPPORT OF
FACEBOOK, INC.'S ADMINISTRATIVE
MOTION TO TEMPORARILY FILE
UNDER SEAL SPECIAL MASTER'S
ORDER AND EXHIBITS THERETO**

1 I, Heather L. Richardson, declare and state as follows:

2 1. I am a partner at the law firm of Gibson, Dunn & Crutcher LLP, counsel of record for
3 Facebook, Inc. (“Facebook”) in the above-captioned matter. I am a member in good standing of the
4 State Bar of California. I submit this declaration in support of Facebook’s Administrative Motion to
5 Temporarily File Under Seal Special Master’s Order and Exhibits Thereto. I make this declaration
6 on my own knowledge, and I would testify to the matters stated herein under oath if called upon to do
7 so.
8

9 2. A true and correct unredacted copy of the Special Master’s August 19, 2022 Order Re-
10 garding Plaintiffs’ Request for Leave to Move for Reconsideration of Order Re: Motion to Compel
11 Production of Documents Related to Protiviti Assessment (the “Order”) and the Exhibits thereto is
12 attached hereto as **Exhibit A**.
13

14 I declare under penalty of perjury under the laws of the United States that the foregoing is true
15 and correct.
16

17 Executed on August 24, 2022 in Los Angeles, California.
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19
20 /s/ Heather L. Richardson
Heather L. Richardson
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